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7 *Attorneys for Defendant*  
8 *Wells Fargo Card Services*

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

10 GINNEY ABEYTA,

11 Plaintiff,

12 vs.

13 BANK OF AMERICA, N.A., SILVER  
14 STATE SCHOOLS CREDIT UNION,  
15 WELLS FARGO CARD SERVICES, and  
EQUIFAX INFORMATION SERVICES,  
16 LLC, a foreign limited liability company;

17 Defendants.

2:15-cv-02320-RCJ-NJK

**STIPULATION TO EXTEND  
DEFENDANT WELLS FARGO'S TIME  
TO RESPOND TO PLAINTIFF'S  
SECOND AMENDED COMPLAINT  
AND PROPOSED ORDER**

**(FIRST REQUEST)**

18 It is hereby stipulated by and between Plaintiff Ginney Abeyta ("Ms. Abeyta"), through  
19 her attorney Michael Kind, and Defendant Wells Fargo Card Services ("Wells Fargo"), through  
20 their attorneys, the law firm of Snell & Wilmer L.L.P., as follows:

21 Ms. Abeyta filed her Second Amended Complaint on January 29, 2016 (Docket No. 25).  
22 In the interest of conserving client and judicial resources, Ms. Abeyta and Wells Fargo stipulate  
23 and agree that Wells Fargo shall have until **March 11, 2016**, in which to file its responsive  
24 pleading. This is the parties' first request for an extension of time to respond to the Second  
25 Amended Complaint and is not intended to cause any delay or prejudice to any party, but is  
26 intended so the parties may discuss settlement.  
27  
28

DATED this 12<sup>th</sup> day of February, 2016.

KAZEROUNI LAW GROUP	SNELL & WILMER L.L.P.
By: <u>/s/ Michael Kind</u> Michael Kind, Esq. Kazerouni Law Group, APC 7854 W. Sahara Avenue Las Vegas, NV 89117 Telephone: (800) 400-6808x7 <i>(signed with permission)</i>	By: <u>/s/ Tanya N. Peters</u> Jeffrey L Willis (NV Bar No. 4797) Tanya N. Peters (NV Bar No. 8855) 3883 Howard Hughes Parkway, Suite 1100 Las Vegas, NV 89169 Telephone: (702) 784-5200 Facsimile: (702) 784-5252
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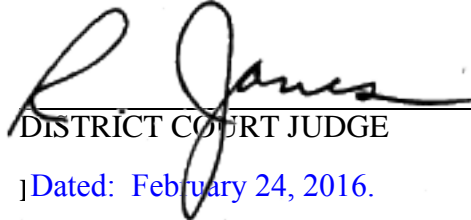
Snell & Wilmer

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**ORDER**

**IT IS ORDERED THAT Wells Fargo's time to respond to Plaintiff's Second Amended Complaint shall be extended to on or before March 11, 2016.**

**IT IS SO ORDERED.**

  
\_\_\_\_\_  
DISTRICT COURT JUDGE  
]Dated: February 24, 2016.

Respectfully submitted by:

SNELL & WILMER L.L.P.

/s/ Tanya N. Peters

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**CERTIFICATE OF SERVICE**

I, the undersigned, declare under penalty of perjury, that I am over the age of eighteen (18) years, and I am not a party to, nor interested in, this action. On this date, I caused to be served a true and correct copy of the foregoing **STIPULATION TO EXTEND DEFENDANT WELLS FARGO'S TIME TO RESPOND TO PLAINTIFF'S SECOND AMENDED COMPLAINT AND PROPOSED ORDER** by the method indicated:

_____	U.S. Mail
_____	U.S. Certified Mail
_____	Facsimile Transmission
_____	Overnight Mail
_____	Federal Express
_____	Hand Delivery
<u>      X      </u>	Electronic Filing

and addressed to the following:

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DATED February 12, 2016.

/s/ Nissa Riley

An Employee of Snell & Wilmer LLP

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